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**UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF WASHINGTON**

LYNDA THOMAS,)	Case No. 2:10-cv-00067-RMP
)	
Plaintiff,)	JOINT CERTIFICATE AND
)	PROPOSED DISCOVERY PLAN
vs.)	
)	
APEX FINANCIAL MANAGEMENT,)	
LLC, and)	
EQUABLE ASCENT FINANCIAL,)	
LLC, f/k/a HILCO RECEIVABLES,)	
LLC)	
)	
<u>Defendants.</u>)	

Joint Certificate and Discovery Plan

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1 Pursuant to this court's minute order dated November 16, 2010, Plaintiff
2 and Defendants attended a "meet and confer" conference and submit this Joint
3 Certificate and Proposed Discovery Plan for the Court's consideration.

4
5 2. Nature and Basis of claims and defenses.

6 This is a case about Defendants' alleged violations of the Fair Debt Collection
7 Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter "FDCPA") and of the Revised
8 Code of Washington, Chapter 19.16, as well as alleged violations of 47 U.S.C. §
9 227(b)(1)(A), ancillary to the collection efforts at issue.

10
11 3. Discovery Plan

12 A. A statement of when the parties exchanged Federal Rule of Civil
13 Procedure 26(a) initial disclosure.

14
15 On May 24, 2010, Plaintiff served her Initial Disclosure on Defendant Apex
16 Financial Management. On June 14, 2010, Defendant Apex Financial Management
17 served its Initial Disclosure on Plaintiff. Defendant Equable Ascent Financial, LLC
18 shall serve its Initial Disclosure on or before December 31, 2010.

19
20 B. Subject of Discovery; Process.

21
22 Discovery will be necessary as to the allegations in Plaintiff's Complaint as well
23 as the substantive defenses raised by Defendants. The parties anticipate depositions of
24 the parties and depositions, as necessary, of third party witnesses. The parties anticipate
25 filing dispositive motions. The parties propose a deadline for the completion of
26

1 discovery to be June 3, 2011. The estimated length of trial is three days. The parties are
2 currently exploring settlement and may request a settlement conference at a later date.

3 C. Issues relating to disclosure or discovery of electronically stored
4 information.
5

6 None at this time.

7 D. Issues relating to claims of privilege or work product.
8
9 None at this time.

10 E. Discovery Limitations
11
12 The parties believe the standard rules of discovery should apply.

13 F. Other Orders
14
15 The parties do not anticipate any additional orders at this time.

16
17 Respectfully submitted this 6th day of December 2010.

18 s/Jon N. Robbins
19 Jon N. Robbins
20 WEISBERG & MEYERS, LLC
21 Attorney for Plaintiff

22 s/Aaron Radbil
23 Aaron Radbil
24 WEISBERG & MEYERS, LLC
25 Attorney for Plaintiff

26
27 Joint Certificate and Discovery Plan

1 s/Jeffrey I Hasson
2 Jeffrey I Hasson
3 Davenport & Hasson LLP

4 s/Robert E. Sabido
5 Robert E. Sabido
6 Cosgrave Vergeer Kester LLP

7
8
9 Filed electronically on this 6th of December, 2010, with:

10 United States District Court CM/ECF system

11 Notification sent electronically via the Court's ECF system this 6th day of December,
12 2010 to:

13 Mr. Jeffrey I Hasson
14 Davenport & Hasson LLP
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16 Portland OR 97230

17 Mr. Robert E. Sabido
18 Cosgrave Vergeer Kester LLP
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22 By: s/ Kimberly Larson
23 Kimberly Larson
24
25
26
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28 Joint Certificate and Discovery Plan